

REMARKS

Claim 1 was objected to on the basis that there was no explanatory information in the preamble of the claim. However, it is not believed that there is any requirement of such. It does not matter whether the method is for cleaning or scrubbing. The invention may be broad enough to cover either. Therefore, reconsideration is requested.

Claim 1 has been amended to include the subject matter of claim 4. Claim 4 was rejected as anticipated by Mikhaylichenko. However, the cited reference is explicit that there is no spraying of solution at any time when the brushes are in contact with the wafer. For example, in connection with Figures 2A-2C, it is explicitly stated at the bottom of column 7 that "however, as can be seen, no rinse fluid is being supplied during the scrubbing operation." This is evident from Figures 3A and 3B as well which shows no rinse solution coming out of the nozzles 216 when the brushes are in contact with the wafer, but only thereafter, when the brushes are moved away from the wafer, does the rinsing occur. Likewise, in the sequence of Figure 3C, it is shown that the spray occurs at a time t5, after the time t3, when the brushing occurred. To the same effect is the flow chart of Figure 8A which indicates that the top and bottom brushes are moved apart from the wafer surfaces while rotating and rinsing the top and bottom wafers after the wafers have been moved apart.

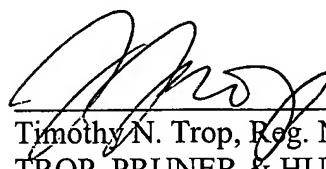
In the claimed solution, there is an interface between the rotating brushes and the wafer when the spray occurs and in the cited reference no such interface exists. To the contrary, the cited reference explicitly and plainly teaches away from the claimed invention. Thus, it would not be possible to fashion a Section 103 reference from the cited reference.

Claims 14-17 were not addressed in the last office action.

In view of these remarks, reconsideration is respectfully requested.

Respectfully submitted,

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